

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Notice of Proposed Rulemaking)	
18 FCC Rcd 13187, 13188 ¶1 (2003))	ET Docket No. 03-137
)	
And)	
)	
Service Rules for the Advanced Wireless Services)	WT Docket No. 12-357
H Block---Implementing Section 6401 of the)	
Middle Class Tax Relief and Job Creation Act of)	
2012 Related to the 1915-1920 MHz and)	
1995-2000 MHz Bands ¶53 footnote 95)	

To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Reply Filed by: Charyl Zehfus
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March 6, 2013

AFFIDAVIT OF

State of Wisconsin]

____Sheboygan____ County]

I, __Charyl Zehfus_____, attest that my statements are true to the best of my knowledge.

Reply round for ET Docket No. 03-137 and WT Docket No. 12-357.

1. My name is Charyl Zehfus_____. My address is __N6158 N. 61st Street, Sheboygan, WI 53083_____.
2. I am a retired librarian.
3. Federal agencies and individuals in positions responsible for radiofrequency and microwave safety limits should be familiar with and understand the importance of the historical evidence consistently showing biological harm.
4. The FCC and others will find a persistence of troubling information from 1933 through 1972 in the attached documents. Added to over 1800 recent studies in the recent 2012 BioInitiative this information reinforces the pressing need for biologically-based limits to be adopted by the FCC for RF and microwave radiation.
5. Please read the attached documents to witness and acknowledge the decades of research that show biological damage and harm from exposure to non-thermal radiofrequency radiation. Thank you.

The attached documents include the following:

6. Dodge, CH. 1969. "Clinical and Hygienic Aspects of Exposure to Electromagnetic Fields: A Review of the Soviet and Eastern European Literature. Biological Effects and Health Implications of Microwave Radiation," Symposium Proceedings, Richmond, Virginia, September 17-19, 1969 (BRH/DBE 70-2) (PB 193 898).

Author Christopher Dodge, affiliated with the Library of Congress, wrote the first comprehensive review of the world (especially the Soviet and Eastern European) literature on the biological effects of microwaves in 1964. The current document was written 5 years later during which time the author was with the Biosciences

Division, U.S. Naval Observatory, in Washington, D.C. This document concentrates on human clinical studies and occupational hygiene surveys of microwave exposure.

Uploaded from Magda Havas site:

<http://www.magdahavas.com/pick-of-the-week-6-clinical-hygienic-aspects-of-exposure-to-electromagnetic-fields/>

7. “Bibliography of Reported Biological Phenomena (‘Effects’) and Clinical Manifestations attributed to Microwave and Radio-Frequency Radiation,” authored by Zorach (“Zory”) R. Glaser, Ph.D., LT, MSC, USNR.

On page 4 of this 106-page document, the security classification reads “*unclassified*”, and the distribution statement reads “*This document has been approved for public release and sale; its distribution is unlimited.*” It was a Research Report (Project MF12.524.05-0004B, Report No. 2) commissioned by the Naval Medical Research Institute, and was authored by Zorach (“Zory”) R. Glaser, Ph.D., LT, MSC, USNR.

Uploaded from the Zory Glaser Archives at Magda Havas site:

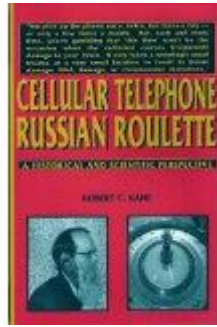
<http://www.magdahavas.com/introduction-to-from-zorys-archive/>

8. [Cellular Telephone, Russian Roulette: A Historical and Scientific Perspective](http://microondes.wordpress.com/2010/04/17/robert-c-kane-cellular-telephone-russian-roulette/) by Robert C. Kane, 2001. (online book cannot be uploaded to FCC, is locked)
<http://microondes.wordpress.com/2010/04/17/robert-c-kane-cellular-telephone-russian-roulette/>

9. Adapted from above website:
Robert C. Kane had been working as top developer inside Motorola for decades, developing mobile phones. He died from brain cancer a few years ago...

The author was actively employed in the telecommunications industry for more than thirty years. He had a BSEE from the Midwest College of Engineering, an MSEE with an emphasis in electromagnetics from the Illinois Institute of Technology. He complete the full course of study and research leading to the Ph.D. in electrical engineering with emphasis in the fields of electromagnetics and sold-state physics.

As a research scientist and product design engineer, he was directly involved with programs and projects for the design and development of portable cell phones, radio frequency mobile radios, microwave telecommunications systems, video display systems and biological effects research



Excerpts from the book (as listed in the book):

10. "[A] repeated insult or irritation to a particular biological area, such as a small region of the brain, can lead to irreparable damage. [G]iven the existence of energy absorption "hot spots". . . each damaging exposure to radiofrequency radiation provides a new opportunity that the damage will become permanent."
11. "[W]e can expect that no warning of brain tissue destruction would be provided to a cellular telephone user until the damage was so extensive that the scalp, which absorbs very little energy, sensed heating."
12. "Every action which occurs within that individual's life during that next week will be affected by the EEG modifications resulting from the portable cellular telephone call."
13. "[E]arlier, researchers have consistently reported that transmitting antennas could not be operated close to the human body—the human head-without violating the safe exposure limits."
14. "[T]he shape of the skull, thickness of sub-cutaneous fat, muscle layering, and how an individual holds a portable cellular telephone each contributes to make the energy absorption different from one individual to another. The important common factor, however, is that all individuals will absorb a large portion of the radiation."
15. "Today we know that even a single exposure to low level radiofrequency radiation causes damage to the DNA makeup of brain cells."

Thank you for reading this compelling, historical expert and scientific information showing RF harm to help understand the need for biologically-based radiofrequency and microwave exposure standards today.

Respectfully submitted by Charyl Zehfus
N6158 N. 61st Street
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March 6, 2013